

State Water Resources Control Board

September 11, 2018

(Via email and Certified Mail)

CERTIFIED MAIL

NO. 7018 0680 0000 1017 5314

Ms. Karen Shelar
Environmental Health and Safety Specialist
Golden Gate Transit
1011 Andersen Drive
San Rafael, California 94901-5318
kshelar@goldengate.org

**SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEM(S)
LOCATED AT THE GOLDEN GATE BRIDGE TOLL PLAZA, 1 TOLL PLAZA
ROAD ADMIN BUILDING, SAN FRANCISCO**

Dear Ms. Shelar:

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the UST(s) at your facility on August 30, 2018, pursuant to authority under Health and Safety Code (H&SC), chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to H&SC, chapter 6.7, and California Code of Regulations (CCR), title 23, chapter 16:

No.	Violation	Tank	Start Date	Stop Date	Regulation
1	Failure to Maintain Operating Permit Onsite – A copy of the current operating permit was not available at the time of inspection.	All	August 30, 2018	Ongoing	H&SC 25284(a); 23 CCR 2712(i)
2	Failure to Provide Valid Board of Equalization (BOE) Number – The BOE number listed in CERS is invalid.	All	August 30, 2018	Ongoing	H&SC 25286(c)(9)
3	Failure to Maintain Monitoring or Testing Records Onsite – The 2017 and 2018 annual monitoring system certification reports for the unleaded tanks were not available at the time of inspection. In addition, there was no documentation indicating the under-dispenser containment (UDC) failure and the untested piping sump listed on the October 19, 2017 secondary containment report was corrected and tested.	Tanks 3 & 4	August 30, 2018	Ongoing	H&SC 25293; 23 CCR 2712(b)

Office of Enforcement | 801 K Street, Suite 2300 | Sacramento, CA 95814 | 916.341.5272

FELICIA MARCUS, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

1001 J Street, Sacramento, CA 95814 | Mailing Address: P.O. Box 100, Sacramento, CA 95812-0100 | www.waterboards.ca.gov

No.	Violation	Tank	Start Date	Stop Date	Regulation
4	Failure to Provide Designated Operator (DO) Training – DO training documentation observed at the time of inspection listed the most recent training as June 2, 2016. DO training must be performed annually.	All	June 3, 2017	Ongoing	23 CCR 2715(f)
5	Failure to Tag Monitoring Equipment – A current monitoring certification tag was not affixed to the annular sensor. Corrected at the time of inspection.	Tank 4	August 30, 2018	August 30, 2018	23 CCR 2638(f)
6	Failure to Monitor Product Piping – The sensors located inside both unleaded tank piping sumps and the diesel UDC, were unable to detect a leak at the earliest opportunity because the sensors were not at the lowest point or in a vertical position. Corrected at the time of inspection.	All	August 30, 2018	August 30, 2018	23 CCR 2630(d)
7	Failure to Maintain Plot Plan/Site Map – An approved plot plan/site map indicating the location of the product piping, tanks, and auxiliary equipment with respect to buildings or other landmarks, was not available in CERS or onsite at the time of the inspection.	All	August 30, 2018	Ongoing	23 CCR 2711(a)(8)
8	Failure to Maintain Release Response Plan – A current UST response plan was not available at the time of inspection.	All	August 30, 2018	Ongoing	23 CCR 2632(d)(2)
9	Failure to Maintain Facility Information – In CERS the facility lists the contract service provider, EPIC Compliance, as the tank operator.	All	August 30, 2018	Ongoing	23 CCR 2711(a)
10	Failure to Maintain Tank Information – In CERS, the tank manufacturer should list Joor. Under product piping construction, primary containment lists steel; however, fiberglass was observed. Under vent piping, primary and secondary containment should list fiberglass.	All	August 30, 2018	Ongoing	23 CCR 2711(a)
11	Failure to Maintain Monitoring Plan – Under tank monitoring, monthly statistical inventory reconciliation and tank integrity testing both list “yes”; however, both should list “no.” Under pipe monitoring, suction piping meets exemption criteria and no regulated pipe both list “yes”; however, both should list “no.” Additionally, under record keeping, tank integrity testing results lists “yes”; however, it should list “no.”	All	August 30, 2018	Ongoing	23 CCR 2632(d)(1)

You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and San Francisco City & County Public Health Department within sixty (60) days from the date of this letter. Have your Designated Operator make specific notations in the next monthly designated operator report indicating the ongoing violations have been corrected. The monthly designated operator report and any associated photos must be submitted as proof of compliance.

Please send all compliance documentation to the following:

State Water Board

Mr. Douglas McDevitt
UST Enforcement Unit
Office of Enforcement
State Water Resources Control Board
801 K Street, Suite 2300
Sacramento, California 95814
douglas.mcdevitt@waterboards.ca.gov

Local CUPA

Ms. Paula Stewart
Program Manager
San Francisco City & County Public Health
Department
1390 Market Street, Room 210
San Francisco, California 94102
paula.stewart@sfdph.org

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

If you have any questions, please contact me at (916) 341-5551, or by email at amantha.henkel@waterboards.ca.gov.

Sincerely,



Amantha Henkel
Senior Environmental Scientist
UST Enforcement Unit
Office of Enforcement

cc: *(via email only)*

Ms. Paula Stewart
Program Manager
San Francisco City & County Public
Health Department
paula.stewart@sfdph.org

Mr. Bill Stafford
Director of Risk Management
Golden Gate Transit
bstafford@goldengate.org